

March 4, 2014

Thurston County Public Health Board

With copies to Jane Mountjoy-Venning and Art Starry

Environmental Health Division

Thurston County Public Health and Social Services

Re: Scatter Creek Aquifer Septic System Management Project

Dear Ladies and gentlemen,

This letter is intended to document for the public record the public comments which I offered regarding the briefing report by staff to the Board on Wednesday February 26, 2014. These comments are not offered in criticism of staff nor of the public process and transparency of the process which the Board has set up to oversee the Scatter Creek Aquifer Septic System Management Project. However the project is now nearing a critical point where we will be inviting a whole new level of public input into the process and in that context I feel it is essential to the ultimate success of the process that we be very careful to keep to the facts which have been developed to date and refrain from making unsubstantiated or inflammatory generalizations regarding conditions existent or which may be offered as being "scientifically predictable" and quantifiable as such. If we fail to stick to the facts and stoop to inflammatory generalizations, not adequately supported by the science, in order to garner public support for what may otherwise be wise agency policy directives, we risk losing that essential public support even before the science behind such proposed policy directives can be explained.

From my personal perspective what I have heard and seen, through my own months of participation in the work of the Citizen's committee, has been an evolving scientific validation of the efficacy and success of more than 40 years of careful and often painful efforts to protect our aquifer for now and in the future. What I have not seen verified or substantiated is that there are today any widespread or systemic human generated influences which would be cause for great panic or public alarm. There is no legitimate cause for exciting the public to rally behind a cry for major tweaking to a system which is in fact working quite well and which the science shows is on a trajectory to continue to function quite well into the future through area-wide build-out as anticipated by our current land use/zoning laws.

A prime example of the kind of unsubstantiated and misleading overgeneralizations which I find most troubling and problematic is that which appears in Paragraph 2 of the Background and Overview of Surrounding Issues section of the Staff's Board Briefing report referenced above. Yes, this kind of sweeping generalization may be effective or even critical to obtain Centennial Clean Water Grants and to give political cover for use of Development Services and PHSS ground water funds, but it does a disservice to the Board by providing a lightning rod for inflaming public opinion against any recommendations as may come from the work of this committee. If the implication is that these kinds

of inflammatory generalizations are appropriate to describe the real world condition of our watershed and aquifer today they are patently false and grossly misleading. For this reason I would urge the Board to give most careful consideration to a re-evaluation of its public information and outreach policies with the eye toward minimizing use of a strategy of hyperbole and emotionalism.

Instead I would urge you to direct staff to develop and employ a strategy based upon congratulating everyone involved with aquifer protection over many years. This would include residents and businesses, governments at all levels, including schools, fire districts, the Thurston County Conservation District, the State Departments of Ecology, Agriculture, Fish and Wildlife, and Thurston County itself, for the stewardship which has brought us to 2014 with a safe and effective system of OSS supporting 18,000 residents with a clean and wholesome aquifer.

None of us can claim credit for the economics which have driven out of our area virtually all of the historical agricultural point sources of great pollution concern. Broadly dispersed small acreage livestock operations which are likely to persist as part and parcel with the rural character preserved in our current zoning laws pose little concern for our aquifer. Even the recent conversion at the Trout Farm west of I-5 from a system of aquifer withdrawal and discharge into Scatter Creek of in excess of three million gallons of water daily to a system where most water is recycled has the potential to dramatically change the ground water modeling for the northwest portion of the study area.

The science based modeling and virtually all verified issues of specific pollution concern have shown that wellhead site placement and management issues are site specific and easily rectified by education on well head management practices. In short what I submit is that the public will be best served if we approach this next round of outreach starting with a summary of all the work which has gone in to the effort to protect the aquifer to date and an acknowledgment that the science now available through the ground water modeling validates the efficacy and effectiveness of these protective measures. We need to explain that instead of projections of calamity in our future, the science now predicts that past measures do indeed provide quite well for the future of our aquifer.

Despite the fact that I personally took the initiative to provide the committee with extensive documentation regarding the massive down zoning completed over the past 20 years, there was no mention of this in the briefing report. Another issue is the as yet under acknowledged effects of the new sensitive areas ordinances and other significant protective measures implemented within this watershed. I respectfully request that staff be directed to give due attention to all of these measures, individually and collectively, in any of its future reports and presentation materials.

I submit that a more acceptable approach would be to offer something positive: Such as, "Since we all want clean water and the best possible environment, we have come up with some minor tweaking through which we can all help to make things even better." And here we can jump off to give voice to all the various initiatives which could be offered to make the world a better place, one OSS and one

new land use or wellhead management practice at a time. In this context I would hope you can see the wisdom of gaining public support for your concerns.

Along the way, I would most certainly hope that the Health Department itself can and will publically acknowledge its own role in causing some of the problems which we will be dealing with for years to come. Two specific examples among these historical wrongs, for example, are its largely scientifically discredited insistence on electric dependent pumped OSS's in our watershed and its failure to require scientifically validated criteria to community well siting approvals, such as the community wells for the Frog Hollow subdivisions located immediately down gradient (both as to surface and hydraulic ground water) from concentrated clusters of OSS. I would also fondly hope that staff will not try to resurrect a notion that there is any practicable nitrate reduction technology available now or close on the horizon which will better treat residential effluents than the long tested and proven gravity systems historically in use throughout our watershed.

The expert testimony presented to the committee confirmed that there is no such system even close to being ready for prime time, not even on an experimental basis. The testimony also shows that there would be no justification for imposing any system of mandatory OSS inspection, maintenance, secondary treatment, or monitoring within this watershed. In fact the only validated recommendation that seems to come forward would be a gradual phase out or retirement of most all of the pumped OSS installations placed in our watershed over the past 15 years.

I am also concerned about answers that were given to questions about aquifer drawdown and longevity. If I had not been present at the meeting, the Board of Health would have been left with erroneous information that the aquifer is being steadily depleted. The fact is, the Rochester Water Association's nine wells are currently standing at approximately the same static level as when they were put into service 20 to 40 plus years ago.

I do hope and trust that you will give due consideration to the observations and suggestions which I have outlined in this letter and in my testimony before the Board last week. We all have a sincere interest in seeing this project through to a successful conclusion. If I can be of any further assistance please do not hesitate to invite further comment.

Sincerely,



Gene Weaver